

November 13, 2009

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Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

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Arizona Corporation Commission

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RE: Docket Number RE-00000C-09-0427

ARIZONA CORPORATION COMMISSION
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Dear Chairperson Mayes and Members of the Arizona Corporation Commission:

We, the undersigned, appreciate the Arizona Corporation Commission's development of rules for an Energy Efficiency Standard and encourage the Commission to move forward with a meaningful Standard that significantly increases energy efficiency in our state.

As you know, energy efficiency offers an immediate, proven and important step consumers and businesses can take to save money, create jobs, stimulate the local economy and reduce the overall energy cost of electric energy services. Energy efficiency costs less than other resources, reduces peak loads, and helps alleviate the need for some new transmission and distribution investments. In addition, energy efficiency offers significant environmental benefits to air quality and public health as it is the cleanest energy resource. It is also a benefit to Arizona's dwindling water supply as most other energy resources require significant water use.

The Energy Efficiency Standard rule should:

1. Require utilities under the Commission's jurisdiction to implement cost effective energy efficiency measures resulting in energy savings at least as great as that contemplated by the draft rule (22% by 2020). Utilities should be urged to go beyond this requirement to benefit residential and business customers.
2. If a base or reference year is used (such as 2005), specify the savings percentages in the rule to achieve the equivalent of at least 20% energy savings as a percent of retail sales in 2020 from energy efficiency, with a credit of up to 2% for demand response.
3. Authorize a performance incentive, the details of which should be determined in the Commission's reviews of energy efficiency implementation plans or in rate cases considering circumstances and experience as they change over time.
4. Ensure energy efficiency programs are ramped up on a yearly basis and are primarily focused on the effects and impacts of energy and utility policies and not primarily on the funding or spending levels.
5. Ensure a transparent process which includes opportunities for broad public participation.

By increasing cost-effective energy efficiency program requirements, Arizona will better incorporate the quickest, cheapest and cleanest way for our state to meet its growing needs into its energy portfolio.

We very much appreciate the leadership and commitment of the Commission to promote a significant, yet achievable energy efficiency standard for Arizona. Thank you.

Sincerely,

/s/

Diane Brown
Executive Director
Arizona PIRG Education Fund

/s/

Tina Beattie
Arizona Coordinator and National Director
Republicans for Environmental Protection

/s/

Leslie Kyman Cooper
Executive Director
Arizona Consumers Council

/s/

John Neville
President
Sustainable Arizona

/s/

Teresa Brice
Program Director
LISC Phoenix

/s/

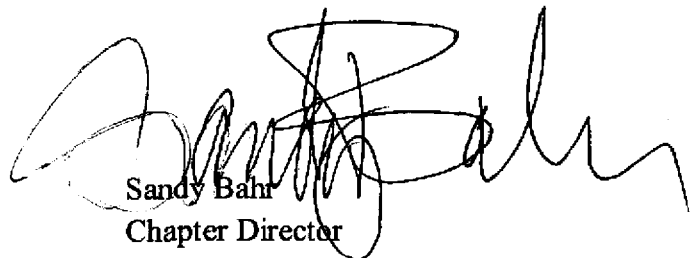
Laura E. Sanchez
Attorney, Air & Energy Program
Natural Resources Defense Council (NRDC)

/s/

Elouise Brown
President
Dooda (NO) Desert Rock Committee

/s/

Al Sterman
Democratic Processes Center



Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter

/s/

Linda Brown
Executive Director
Arizona Advocacy Network

/s/

Roger Clark
Air and Energy Director
Grand Canyon Trust

/s/

Hunter Lovins
President
Natural Capitalism, Inc.

/s/

Doug Bland
Arizona Interfaith Power and Light
Earth Care Commission,
Arizona Ecumenical Council

/s/

Steve Brittle
Director
Don't Waste Arizona

/s/

Bret Fanshaw
Environmental Associate
Environment Arizona

/s/

Tom Kociemba
High Performance Building Team